

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

JOSEPH NAPARSTEK, <i>et al.</i> ,	)	CASE NO.: 4:11-cv-02026-RBH
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
ATLANTIC CREDIT & FINANCE, INC.,	)	<b><u>DEFENDANT’S ANSWERS TO</u></b>
	)	<b><u>MANDATORY INTERROGATORIES</u></b>
Defendant.	)	<b><u>PURSUANT TO L.R. 26.01</u></b>
_____	)	

Now comes Defendant Atlantic Credit & Finance, Inc. (“Defendant”), by and through counsel, and for its Answers to Interrogatories pursuant to L.R. 26.01, provides as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER:** There are no persons or legal entities that have a subrogation interest in Defendant’s claims or defenses.

B. As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER:** The Plaintiff has requested a jury trial.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**ANSWER:** Defendant is not publicly owned and has no parent, subsidiary, partner, or affiliate that is publicly owned.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

**ANSWER:** The United States District Court for the Southern District of New York transferred this case to this division after it granted Defendant's Motion to Dismiss or Transfer Venue. Plaintiff resides in South Carolina and his claims are based on a letter written by South Carolina attorneys hired by Defendant, which was mailed and received in South Carolina.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

**ANSWER:** No.

F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER:** Defendant has been properly identified.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER:** Defendant did not prepare and send the letter at issue in this case. The letter was prepared by the law firm of Richardson, Plowden & Robinson, P.A. – a firm hired by Defendant to collect Plaintiff's account. Defendant had no knowledge of the letter.

s/Thomas W. Bunch, II  
Thomas W. Bunch, II [1597]  
ROBINSON, MCFADDEN & MOORE, P.C.  
Post Office Box 944  
Columbia, SC 29202  
(803) 779-8900

August 15, 2011